

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

Criminal No. 21-20287

v.

Honorable Denise Page Hood

Leksi Vulaj,
aka Aleksander Vulaj,
aka Aleksander Vuljaj,
,

Defendant.

**GOVERNMENT’S MOTION, SUPPORTING BRIEF,
AND ORDER TO PARTIALLY UNSEAL SUPERSEDING INDICTMENT
AND ARREST WARRANT**

The United States of America hereby moves for an order to partially unseal the Superseding Indictment and Arrest Warrant in this case in order to allow for disclosure to and by the United States Department of State and law enforcement personnel, including foreign authorities, in connection with the performance of their duties and for the purpose of locating, arresting and extraditing the defendant. In support of this motion, the government states:

1. The Superseding Indictment and Arrest Warrant in this case charges the Defendant with one or more federal crimes.

2. The Superseding Indictment and Arrest Warrant were sealed by order of the Court on June 9, 2021.
3. The United States anticipates working with the United States Department of State and foreign law enforcement authorities to locate, arrest, and extradite the Defendant. In that effort, the United States is required to provide a copy of the charging document, in this case the Superseding Indictment, and the Arrest Warrant to the Department of State and to foreign authorities and/or disclose the existence of the Superseding Indictment and/or Arrest Warrant.
4. Rule 6(e)(4) of the Federal Rules of Criminal Procedure, which authorizes this Court to seal indictments, implicitly authorizes this Court to unseal indictments.
5. Accordingly, the government requests an Order partially unsealing the Superseding Indictment and Arrest Warrant only for the purpose allowing for disclosure to and by law enforcement personnel, including foreign authorities, and the Department of State in connection with the performance of their duties and for the purpose of locating, arresting, and extraditing the Defendant.
6. Furthermore, because the Defendant has not been arrested and may flee or attempt to evade extradition, destroy evidence, or intimidate

witnesses, the government requests that this Motion, any minute entry,
and the Court's Order be sealed until further order of the Court.

WHEREFORE, the government requests this Court to issue an order
unsealing the Superseding Indictment and Arrest Warrant, and sealing this Motion,
any minute entry, and the Court's Order.

Respectfully submitted,

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s/Thomas Franzinger
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Dated: August 20, 2021

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ORDER TO SEAL

The government having moved to partially unseal the Superseding Indictment and the Arrest Warrant and the Court being duly advised in the premises;

IT IS HEREBY ORDERED that the Superseding Indictment and Arrest warrant may be served upon the United States Department of State and any foreign law enforcement or diplomatic agencies, as necessary to effect the arrest of the Defendant, and may be served upon or revealed to the Defendant.

IT IS FURTHER ORDERED that the United States' Motion, any minute entry, and this Order be sealed until further Order of the Court.

s/Denise Page Hood

Denise Page Hood

United States District Judge

Entered: August 20, 2021